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State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

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Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

MEMORANDUM

Date: January 4, 1993

From: Jim Janssen, BOL/DRM

To: Jim Park, BOW

Subject: L1630200005 -- St. Clair County
Sauget Sites (Area I) -- Sauget
Superfund/General Correspondence

On December 28, 1992, Paul Takacs of my staff received a call from USEPA Region 5 regarding pollution problems in East St. Louis and at the Sauget Sites. Senator William Cohen from Maine had been notified by one of his constituents about a National Public Radio program mentioning sewers running through East St. Louis schools and toxic spills so severe that "children riding their bikes near the chemical plants are igniting". These problems appear to be related to the American Bottoms POTW and Dead Creek in Sauget and Cahokia. The stories evidently came from a recently published book entitled "Savage Inequalities".

Senator Cohen made a request to USEPA that they investigate the allegations and report back to him. Region 5 faxed a copy of their reply to the senator for IEPA review. BOL has made modifications on the Sauget material, however you may need someone to check the portions that talk about the East St. Louis sewer system.

USEPA requested that the letter be reviewed by tomorrow, January 5. If you have any concerns or need additional background information, please do not hesitate to contact Paul Takacs at 5-3912.

Attachment

cc: Paul Takacs (w/o attachment)
Terry Ayers (w/o attachment)
Gary King
William Child
David Engle
Division File

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State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-3912

Refer to: L1630200005 -- St. Clair County
Sauget Sites (Area I) -- Sauget
Superfund/General Correspondence

January 5, 1993

Ms. Karen Lumino
USEPA Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Dear Karen:

This is in reference to your request for comments on the letter to Senator Cohen. It is my understanding that you have already spoken with Jim Leinicke today regarding his input to the letter. My comments, which are primarily editorial are set forth below:

1. In the first full paragraph on page 2, the second sentence should reflect that Dead Creek runs through the villages of Sauget and Cahokia. As far as the next sentence is concerned, the creek flows through industrial and residential areas and is not actually dry or devoid of vegetation. In the following sentence, please insert "the creek" after 90 degrees for clarity. Also add the sentence at the end of this paragraph, "There have been no recent occurrences of smoldering in the creek".

2. The first line of the next paragraph on page 2 has a typo (change "was" to "has"). Also, in the list of contaminants, change "chlorobenzene" to "chlorobenzenes", replace "chlorophenols" with "naphthalene" and change "accounts" to "accounted".

3. In the third sentence of the same paragraph, please replace with "The site did not initially make the NPL because of data gaps in the scoring packages. An expanded site investigation was subsequently completed by the Illinois EPA, however impending changes in HRS made an immediate listing impossible.

4. Lastly, the cc to Mary Gade should include her title as the director of Illinois EPA.

The Illinois EPA appreciates the opportunity to have input in this letter. If you have any questions about these comments or need additional information, please do not hesitate to call.

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State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

2200 Churchill Road, Springfield, IL 62794-9276

Mary A. Gade, Director

Sincerely,

Paul E. Takacs, Project Manager
Federal Sites Management Unit
Division of Remediation Management
Bureau of Land

cc: Terry Ayers
Jim Janssen
Jim Leinicke
Division File

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1630200005 St Clair
Sauget
St/Seale

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Honorable William S. Cohen
United States Senate
Washington, D.C. 20510

Dear Senator Cohen:

Thank you for your letter dated November 30, 1992, to Mr. Robin Grove, on behalf of your constituent Ms. Kit Hathaway. I have enclosed a copy of your correspondence as well as your constituent's inquiry for your reference. The environmental problems faced by East St. Louis, Illinois, are myriad, and the local monetary resources to address them limited. We appreciate the opportunity to provide you with information about past and present efforts in this area.

East St. Louis is on the Mississippi River in an area of high groundwater and flat topography. As a result, the sewer system is very shallow, and pumping, or lift, stations are needed to convey wastewater to the treatment plant which is located in the neighboring town of Sauget. Shortly after the system in Sauget was brought on line in the early 1980's, East St. Louis dropped its user fees, which were the source of funding for sewer operation and maintenance. Approximately two-thirds of the 19 lift stations in the system are currently inoperable.

The sewer system in East St. Louis is a combined system which means that it needs to cope with extra flows during wet weather events. Five or six years ago, during a period of sustained heavy rains, the impaired system did overflow into a high school cafeteria, among other areas. Although spot repairs were made to prevent the system from backing up into the school again, the general state of disrepair continues to allow backups and overflows, to varying degrees, depending on the severity of flooding.

Combined sewer overflows to navigable waters during wet weather conditions are allowed under the Clean Water Act, though the State of Illinois has its own regulation requiring control and treatment of these overflows. The City has been issued a permit that requires East St. Louis to come into compliance with Illinois control requirements prior to the discharge of combined sewer overflow to the Mississippi River. Discharges to navigable waters during dry weather, however, are not allowed.

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Unfortunately, sewer backups into basements are not illegal under state or federal environmental regulations. Still, it is a situation that the U.S. EPA and Illinois Environmental Protection Agency (Illinois EPA) would like to see improved. In 1977, the City of East St. Louis received federal funding to rebuild portions of the sewer system. In 1986, the State of Illinois also appropriated monies to rehabilitate the sewer system. These State of Illinois funds, plus funds offered by HUD, would have financed a complete rehabilitation of the entire system. A key stipulation, however, was that the City reinstate a user fee system to cover operation and maintenance. (The residential fee was estimated to be \$1.50 to \$2.00 a month, per household.) To date, the City Council has not done so but has proposed collecting user fees in its 1993 budget, which is currently going through the public review process. Although the State's appropriation is still available, with inflation and continued neglect, it will not go as far as it would have in 1986.

To the best of our knowledge, there have been no reports of children catching on fire as a result of riding their bicycles near chemical plants in or around East St. Louis, as was related by your constituent. What she may be referring to is Dead Creek, which runs through both industrial and residential areas of the villages of Sauget and Cahokia. There were reports of Dead Creek glowing at night in the late 1970's, and, if daytime temperatures exceeded 90 degrees, the creek was known to smolder. A dog that allegedly received chemical burns as a result of playing in Dead Creek was inaccurately reported as having burst into flames. There have been no recent occurrences of smoldering in the creek.

Sediment contamination in Dead Creek has been found to include heavy metals, chlorobenzenes, naphthalene, PCBs, and phosphorus, which accounted for the ignitability. In 1982, U.S. EPA fenced in the portions of Dead Creek that posed an immediate threat to human health, and the State of Illinois set about collecting the data necessary to complete the Hazard Ranking System (HRS) scoring package for the National Priorities List (NPL). The site did not make the NPL because of data gaps, which meant that Federal dollars could not be used to clean up the site. An expanded site investigation subsequently was completed by the Illinois EPA; however impending changes in the HRS made an immediate listing impossible. Due to lack of resources and the fact that the immediate threat had been removed, the site was never remediated. Illinois EPA will be working with a U.S. EPA contractor in 1993 on rescoring the site under the new HRS, which was revised in December 1990. We expect the scoring package to be completed in time for the August update to the NPL. Recent soil sampling indicates that phosphorus is no longer present, removing the threat of combustion.

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Toxic spills in East St. Louis, or anywhere in the United States, should be reported to the National Response Center hotline at 1-800-424-8802. In U.S. EPA Region 5, responding to emergency spills is a partnership with the States. The Agency will respond to toxic spills and uncontrolled hazardous waste sites when State environmental or public health agencies request Federal assistance under the Superfund program. In May 1992, the Illinois EPA requested our assistance with the cleanup of the Lanson Chemical site where abandoned tanks and drums contain resins and other wastes contaminated with PCBs. The \$2 million cleanup is expected to be completed by February 1993.

You may be interested to learn that we are in the very early planning stages of a geographic initiative in the East St. Louis area. A geographic initiative is an effort to concentrate resources on a geographic area in order to enhance and focus environmental activity. Geographic initiatives have two components: (1) to ensure that all environmental laws and regulations are complied with, and (2) to initiate creative approaches to environmental problems that are not addressed by traditional regulatory programs. We have used this approach in Northwest Indiana/Southeast Chicago with great success, and if the East St. Louis geographic initiative becomes a reality, we would anticipate similar results.

If you have any further questions regarding this matter, please feel free to contact me.

Sincerely yours,

/s/ original signed by
Valdas V. Adamkus

Valdas V. Adamkus
Regional Administrator

Enclosures

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